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November 10, 2005

Office of Nutritional Products
 Labeling and Dietary Supplements (HFS-810)
 Center for Food Safety and Applied Nutrition
 Food and Drug Administration
 5100 Paint Branch Pkwy
 College Park, MD 20740

NOV 17 2005

21411 Praire St
 Chatsworth,
 California 91311

P: 818.739.6000
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Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, this letter (original and two copies) serves as notification that Natrol, Inc., located at 21411 Prairie Street, Chatsworth, CA, 91311, proposes to make statements of nutritional support for the dietary supplement product(s) listed below under the Natrol® brand.

Product Name	Statement(s) of Nutritional Support	Ingredients
Bilberry 40 mg	Supports Eye Health One of the most popular herbs on the market today, bilberry is an antioxidant known for its reported ability to support vision. Natrol® Bilberry Extract utilizes the antioxidant properties of bilberry to support vision health.	Bilberry Extract (berry)
BioBeads Probiotic Acidophilus	Guaranteed 1 Billion Live Cultures Natrol® BioBeads™ proprietary probiotic blend is uniquely protected, by an advanced triple shell that dissolves only upon reaching its destination. A billion probiotics guaranteed!	Proprietary Probiotic Blend: Lactobacillus acidophilus Bifidobacterium bifidum Bifidobacterium longum Lactobacillus rhamnosus
Coral Calcium	Supports Healthy Bone Structure Calcium is essential for bone strength. But did you know that calcium intake depletes magnesium? Natrol® Coral Calcium provides pure, natural calcium plus a balanced ratio of magnesium and other essential trace minerals. Natrol Coral Calcium is environment-safe and above-sea-level sourced.	Vitamin D (as Cholecalciferol) Calcium (as Coral Calcium) Magnesium (from Coral and Amino Acid Chelate)
DHEA	Found naturally in the body, DHEA (Dehydroepiandrosterone) usually reaches peak levels in early adulthood, then steadily decreases every year afterward. Natrol® DHEA contains the highest quality of this hormonal precursor available in supplement form.	DHEA (Dehydroepiandrosterone)

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	Making sure you use the proper amount of DHEA is essential for best results. Each Natrol DHEA tablet contains 25 mg of this hormonal precursor, precisely verified by the High Pressure Liquid Chromatography (HPLC) technique.	
Eye Support Formula Herbal Blend	Doctor-formulated by a clinical herbalist, Natrol® Eye Support is designed to work with the body's systems naturally. By incorporating key master herbs with distinct supporter herbs, we assure you of a balanced formula for eye health.	Bilberry Extract (Vaccinium myrtillus) (fruit) Lutein (from Marigold) Blueberry (Vaccinium myrtillus) (leaf) Eyebright (Euphrasia Officinalis) (leaf) Red Raspberry (Rubus idaeus) (leaf) Barberry (Berberis vulgaris) (bark) Pulsatilla (Pulsatilla nigricans) (leaf)
Fat Burner Non Ephedra	Fat-Burning Formula. Fat-Burning Energy. Don't put up with excess fat...burn it! Fat Burner puts you in control -- our special Fat Burner Blend was formulated with thermogenic components that support your fat-burning mechanism. Fat Burner lets you harness the power of food to make it work for you, not against you. Each of Fat Burner's scientifically advanced ingredients is specifically designed to help burn fat and provide a sense of energy. This product is to be used in conjunction with a healthy calorie reduction and exercise program.	Chromium Mucuna pruriens Root Extract Bitter Orange Fruit Extract Caffeine
Grape Seed Extract 50 mg	Contains naturally occurring proanthocyanidins, phytochemicals which exhibit antioxidant properties and help to combat free radicals.	Grape Seed Extract (Vitis vinifera)
Gymnema Sylvestre 300 mg	Gymnema Sylvestre is an herb which has been used for centuries for its health benefits. Natrol® Gymnema Sylvestre is provided in the most desirable form, a pure 5:1 extract. Pullulan, a polysaccharide, may enhance the effects of Gymnema Sylvestre.	Gymnema Sylvestre 5:1 Extract (Leaf) Pullulan Powder

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Product Name	Statement(s) of Nutritional Support	Ingredients
Kid's Companion Cognitive Formula	The Kid's Companion® Cognitive Formula is a state of the art blend of nutrients that, along with a healthy diet, may enhance your child's well-being.	Vitamin C (as Calcium Ascorbate) Vitamin E (as d-Alpha Tocopheryl Acetate) Vitamin B-6 (as Pyridoxine HCl) Vitamin B-12 (as Cyanocobalamin) Calcium (as Calcium Ascorbate) Iron (as Iron Amino Acid Chelate) Magnesium (as Magnesium Amino Acid Chelate) Zinc (as Zinc Amino Acid Chelate) Copper (as Copper Amino Acid Chelate) Chromium (as Chromium Polynicotinate) DHA (Docosahexaenoic Acid) DMAE (Dimethylaminoethanol Bitartrate) Inositol Taurine
Kid's Companion Liquid Formula	The Kid's Companion® Liquid Formula provides a comprehensive profile of vitamins and select nutrients to promote overall good health for your children.	Vitamin A (as 100% Beta Carotene) Vitamin C (as Calcium Ascorbate and Ascorbic Acid) Vitamin D (as Cholecalciferol) Vitamin E (as dl-Alpha Tocopheryl Acetate) Thiamin (as Thiamin HCl) Riboflavin Niacin (as Niacinamide) Vitamin B-6 (as Pyridoxine HCl) Folate (as Folic Acid) Vitamin B-12 (as Cyanocobalamin) Biotin Pantothenic Acid (as d-Calcium Pantothenate)
Omega-3 Glucosamine	<p>Advanced Joint Care Increase Joint Comfort</p> <p>Wherever hard bones come together, soft tissue must come between them in order to cushion, protect and lubricate. This tissue needs nourishment to do its job properly. Natrol's Omega-3 Glucosamine is an advanced joint health formula designed to benefit joint health using the latest scientific improvements and a synergistic combination of natural bioactive compounds.</p> <p>Unlike traditional joint care products, Omega-3 Glucosamine provides support for managing joint discomfort while</p>	Omega-3 Fatty Acids Glucosamine HCl Chondroitin Sulfate

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	<p>rebuilding your joints. It features a unique combination of marine-sourced Omega-3 concentrate (with nearly twice the EFA active ingredients as regular fish oil); and glucosamine, which has been shown to repair and regenerate cartilage tissue.</p> <p>Natrol's Omega-3 Glucosamine formula helps strengthen joint tissues and maximizes effectiveness by combining three of the most beneficial ingredients shown to assist with joint care, to deliver an ideal combination of natural bioactive compounds:</p> <p>Omega-3 is an essential fatty acid necessary for a variety of biological processes and used by virtually every cell in the body. The latest research shows that omega-3 can help soothe and comfort joints.</p> <p>Glucosamine has been proven to rebuild joints by repairing and regenerating the cartilage that forms them. Because this rebuilding takes time, best results are obtained with daily supplementation.</p> <p>Chondroitin is found naturally in the body, and helps support cartilage and enhance joint health.</p>	
PMS Control	Natural Approach for PMS Support	Vitamin B-6 (as Pyridoxine HCl) Vitamin B-12 (as Cobalamin) Calcium (as Calcium Carbonate) Magnesium (as Magnesium Oxide) Chromium (as Chromium Picolinate) Evening Primrose Oil Powdered Gymnema Sylvestre Extract (leaf) Dong Quai Extract (root) Ginger Extract (root) Parsley Powder (leaf) St. John's Wort Extract (flowers) Uva Ursi Extract (leaf) Red Raspberry Powder (leaf) Squawvine Powder (aerial part) Chastetree Powder (leaf)
Quercetin	Helps Support Immune System. Found in apples, tea, grapes and other foods, quercetin is an antioxidant which can support your immune system.	Quercetin
Rhodiola	Promotes Stress Resistance and Energy	Rhodiola rosea Extract (root)

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	Also known as golden root, Rhodiola rosea has been used for generations by people in Siberia to help combat mental and physical fatigue. Like the ginseng it is often compared to, Rhodiola is known to help increase energy.	
Sambucus Tree Liquid Elderberry with Ester-C® 250 mg	Natrol's great tasting Liquid Black Elderberry + Ester-C® helps support the body's own immune system. Ester-C® is a patented form of Vitamin C that provides key metabolites which lead to enhanced bioavailability at the cellular level. This patented manufacturing process neutralizes the pH level, making Ester-C gentle on the digestive system.	Vitamin C (as Calcium Ascorbate) Calcium (as Calcium Ascorbate) Elderberry Extract (European Sambucus nigra, berry)
Sleep N' Restore	<p>Promote Normal Sleep Patterns with Melatonin and Valerian. Wake Up Refreshed with Powerful Antioxidants. This comprehensive nighttime formula helps promote a more restful, deeper sleep while supporting your body's natural restoration processes. The combination of Melatonin and Valerian helps promote normal sleep patterns. While our powerful antioxidant formula provides your resting body with the fighting power it needs to restore and protect its cells from damage developed due to poor diets and busy lifestyles.</p> <p>This formula takes advantage of the natural restorative events that occur while we sleep such as free radical removal and increases in growth hormones. Sleep N Restore® will help maintain your youthful body and energy. You won't have that groggy feeling the next morning. With Sleep N Restore you wake up refreshed and ready to tackle the day.</p> <p>Melatonin and sleep naturally increase growth hormone levels. Valerian promotes a natural quality of sleep. Studies show that Vitamin E protects our bodies from oxidative damage induced by our daily activities</p>	Vitamin E (as d-Alpha Tocopheryl Succinate) Calcium (as Calcium Carbonate) Melatonin Valerian Root Glutamine Grape Seed Extract
Soy Isoflavones	Supports Hormonal Balance and Bone Health To Meet the Changing Needs of Women. Soy is a natural source of isoflavones that provide benefits such as hormonal balance support and bone	Isoflavones (from Soy Extract)

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	health. The amount of soy isoflavones necessary to achieve these benefits can be difficult to incorporate into today's diet. Natrol® Soy Isoflavones support the changing nutritional needs of women throughout all stages of life.	
Stress Complex	Sleep Restfully. Relax the Mind. Relax the Body	Thiamin (Vitamin B1) (as Thiamin Mononitrate) Riboflavin (Vitamin B2) Niacin (as Niacinamide) Vitamin B6 (as Pyridoxine HCl) Folic Acid Vitamin B12 (as Cyanocobalamin) Melatonin Valerian Extract (Root)
Zero Flush Niacin	Natrol Zero Flush® Niacin can play an important role in cholesterol metabolism. This product was developed using a time release technology allowing higher doses of niacin without the skin flush. Helps to maintain cholesterol levels that are already within a normal range.	Niacin (as Hexa-Nicotinate Inositol)

Please be advised that the product(s) prominently displays the following statement:
"These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent disease."

Sincerely,
NATROL, INC.


Kathleen Dunn, MPH, RD
Senior Compliance Manager